

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SONYA LARSON,

Plaintiff

v.

C. A. No.: 1:19-CV-10203-IT

DAWN DORLAND PERRY,
COHEN BUSINESS LAW GROUP, PC and
JEFFREY A. COHEN, ESQUIRE,

Defendants.

**DEFENDANT DAWN DORLAND PERRY'S SUPPLEMENTAL MEMORANDA
PURSUANT TO THE COURT'S JULY 31, 2019 ORDER**

Pursuant to the Court's July 31, 2019 Order, Defendant Dawn Dorland Perry ("Ms. Dorland") submits this supplemental memorandum to respectfully request that the Court dismiss Count I (intentional interference by Dorland with Larson's ASF contract), Count II (intentional interference by Dorland with Larson's BBF contract), and Count VII (defamation claim against Dorland) of Plaintiff Sonya Larson's Amended Complaint and Demand for Trial By Jury. In support of her request and as reasons therefore, Ms. Dorland incorporates the recitation of facts and arguments in her initial Motion to Dismiss [#25] and the supporting Memorandum [#26], along with the arguments in her Opposition to Plaintiff's Motion for Leave to File Amended Complaint [#49] concerning the futility of the amendments to the original Complaint.

WHEREFORE, and for the reasons set forth above, Ms. Dorland respectfully requests that the Court dismiss Counts I, II, and VII of the Amended Complaint and Demand for Trial by Jury as asserted against her, with prejudice and without further leave to amend.

Respectfully submitted,

DAWN DORLAND PERRY,

By her attorneys,

/s/ Suzanne Elovecky

Howard M. Cooper, Esq. (BBO # 543842)

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Date: August 8, 2019

CERTIFICATE OF SERVICE

I, Suzanne Elovecky, hereby certify that on August 8, 2019 the foregoing document was served electronically on all counsel of record via the Court's ECF filing system.

/s/ Elizabeth E. Olien

Elizabeth E. Olien